

63-285 County-Initiated Mid-Period Actions

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63-285.1 County-Initiated Mid-Period Reports

The changes in eligibility status listed below are considered County-Initiated. These changes may occur at any time during the semi-annual period. Take action at the end of the month in which you can send timely notice even if it results in a decrease in benefits. County-Initiated action include but are not limited to:

- A. Sanctions or financial penalties;
- B. Failure of a member of the household to comply with a Quality Control Review;
- C. Discontinuances due to the termination of a CalWORKs Inter-County Transfer;
- D. Benefits are applied for and approved for a household member in another household or for the household;
- E. CalWORKs is approved mid-period;
- F. Change from state funded California Food Assistance Program (CFAP) to federally funded Supplemental Nutrition Assistance Program (SNAP) which shall be seamless to the client;
- G. Cost of Living adjustments (COLAs) for CalFresh, CalWORKs, General Assistance and for those COLAs administered by the Social Security Administration;
- H. Adjustments due to erroneous or incomplete SAR 7 or mid-period reports of information or lack of action by the County on

the SAR 7 or mid-period recipient reports (refer to [63-285.2, and 3](#));

- I. The three-month limit for an ABAWD ends or an ABAWD who is not exempt and doesn't reside in an area with an ABAWD waiver who has regained eligibility and subsequently stops meeting the work requirements;
- J. The County discovers Transitional CalFresh recipients have moved out-of-state and are receiving public benefits (TANF and/or SNAP) in another state (ACIN I-41-10); and
- K. A member of the household receives SSI/SSP benefits.

63-285.2
Decrease of
Benefits Mid-
Period Due to
Late SAR 7

Submission of a late SAR 7 may require that benefits be reduced for the second month of the SAR period.

Establish an Inadvertent Household Error (IHE) overissuance (claim) when a recipient submits a late SAR 7 (after the 11th of the SAR 7 submit month) which results in the household receiving more benefits than entitled because you are unable to decrease benefits due to the 10-day notice requirement.

If the SAR 7 is...	Then establish...
Received timely (by the 11 th of the Submit Month) but was not processed or was processed incorrectly by the County,	An Administrative Error (AE) overissuance if the household receives more benefits than entitled to, when there is not sufficient time to provide a 10-day notice to decrease benefits effective the first month of the SAR period. Decrease benefits effective the second month of the SAR period.
Submitted late (after the 11 th of the Submit Month), but before NOA cut-off and the SAR 7 was not processed by the county until after the NOA cut-off,	An IHE overissuance if the household receives more benefits than entitled to, when you don't have sufficient time to provide a 10-day notice to decrease benefits effective the first month of the SAR period.
Submitted after NOA cut-off, but by the Extended Filing Date,	Decrease benefits effective the second month of the SAR period.

NOTE: Timely notice is only required for adverse actions during the certification period. A 10-day notice is not required to reduce benefits at recertification.

63-285.3
Case Correction
Due to County
Error

When you discover that a household is receiving an erroneous allotment, correct the error mid-period even if benefits are decreased mid-period.

You must correct an erroneous payment as soon as it is discovered, whether it is a client (IHE) or administrative-caused (AE) error.

Example:	
Scenario	<p>A CalFresh household correctly reports income of \$400 a month on their May 2013 SAR 7.</p> <p>Two months later in July 2013 the worker realizes that the income was incorrectly entered as \$40 a month.</p>
Outcome	<p>Take action immediately to correct the error:</p> <ul style="list-style-type: none">• Recalculate the allotment and decrease benefits for August 2013 with timely notice and• Establish an AE overissuance for June and July 2013.• Begin recoupment of the claim after the certification month effective January 2014. Refer to 63-285.4 below.

Refer to [63-287, Overissuances and Underissuances](#).

63-285.4
Recoupment of
Claims

Recouping an overissuance (claim) is not a County-Initiated Mid-Period Action. Therefore, you may only initiate benefit adjustment/reduction to begin recouping a claim at the beginning of a semi-annual period (after the SAR 7 or recertification submit month) unless the recoupment does not result in a decrease of benefits.

For example, if recoupment of one claim is completed mid-period, you may begin recoupment on a second claim in the following month if the recoupment amount of the second claim is equal to or less than the first.

Refer to [63-287.10, Claim Recoupment by Allotment Reduction](#).

63-285.5
Public
Assistance (PA)
Grant Changes
Mid-Period

The receipt of Public Assistance (PA) benefits is considered Known-to-County information.

- When a joint CalWORKs and CalFresh application is received and CalWORKs is granted after CalFresh has been approved, the new CalWORKs grant will be budgeted effective the month after CalWORKs is approved. No timely notice is required because the CalFresh approval notice (CF 377.1) informed the

household that benefits could be lowered after granting CalWORKs.

- When a PA Grant is recalculated mid-period, budget the new PA Grant amount in the CalFresh budget effective the first of the month for which timely notice can be provided to the household.
- When a PA Grant application is approved mid-period the receipt of PA grant will result in a County-Initiated mid-period action. Budget the PA grant effective the first of the month for which timely notice can be provided to the household.

Example 1:	
Scenario	A CalFresh household with a December recertification month applies and is approved for CalWORKs on March 10 th .
Outcome	The CalWORKs grant will be used in the CalFresh budget effective April.

Example 2:	
Scenario	Same as Scenario 1, but CalWORKs is approved March 25.
Outcome	The CalWORKs grant will be used in the CalFresh budget effective May.

63-285.6
Third
Party/Known to
County
Information

Under certain circumstances, information is considered “Known-to-County” or could be provided through a third-party. For example, action in the following circumstances:

- Calculate an overissuance when the information received was a mandatory report and is obtained after benefits have been issued in the wrong amount, such as in the case of Income and Eligibility Systems (IEVS) matches ([63-284.3\(C\)](#)); and
- Take prospective action to change benefits mid-period or at the beginning of a semi-annual period if you learn that the recipient failed to accurately report changes on a mandatory mid-period report, on the SAR 7, or at recertification.

In the case of third party reports that provide information that conflicts with what the household reported, follow current regulations regarding how to handle discrepant case file information. Refer to [63-117.31](#) and [63-708](#).

Contact the household to indicate that eligibility information is in

question and give the opportunity to the household to verify the correct circumstances before taking action to reduce benefits.

Refer to [63-117.4](#), [63-117.23](#) and [63-117.31-32](#).

Example:	
Scenario	Public Assistance Fraud Division (PAFD) reports that a person is no longer in the home.
Outcome	<p>Although the household is not required to report household composition changes mid-period and a PAFD report is considered Known-to-County, send a CF 377.6 SAR to find out when the household member left the home:</p> <ul style="list-style-type: none">• If the household member was supposed to be reported during a mandatory report (SAR 7 or recertification) discontinue the person with timely notice and compute an overissuance effective the month the person should have been discontinued.• If the household member left during the current payment period, send a “No Change NOA,” write in case comments and in the “<i>Maintain Held Change Notes</i>” page in CalWIN for follow up with the next SAR 7 or recertification.

63-285.7
Action on Third
Party/Known to
County
Information

All third party information that is received by or known to the county must be acted upon in accordance with SAR rules.

- A. If a change is required to be reported by the household under SAR rules, verify the information and take action based on the verified information.
- B. If a change is not required to be reported, such as a change of income that is not over the IRT or verified upon receipt (VUR), ensure that the next semi-annual report (SAR 7 or recertification) is consistent with other information already reported (Known-to-County). Enter the information in case comments in the “*Maintain Held Change Notes*” page in CalWIN for follow up with the next SAR 7 or recertification.
- C. If the information on the SAR 7 or recertification form is not consistent with what has already been reported or is being reported through a third party, try to resolve the discrepancy. If you cannot resolve the discrepancy, the SAR 7 or recertification will be considered incomplete.

It is important to note that while third party information may be useful to the worker, under some circumstances you cannot take action. For

example, **do not take mid-period action based on third party information regarding changes that a household is not required to report during the certification period.** (The exception is if the situation turns into a County-Initiated Action, such as approving aid in another household or a child being placed in Foster Care).

If you receive information about changes in household composition mid-period, do not take any case action based on this third-party information. However, if you receive or know about information that the household is required to report, such as income in excess of the IRT and the household has not reported the information, take action to resolve the discrepancy and take appropriate action once the information has been verified.

Example 1:	
Scenario	A worker is notified that a household member started a new job.
Outcome	<p>The worker finds out that the household member started the job in the middle of the certification period and income from the job does not exceed the household's IRT.</p> <p>The household has no obligation to report the new job until the next SAR 7 or recertification whichever occurs first.</p> <p>Do not take any action until the next SAR 7 or recertification. Write in case comments and in the <i>"Maintain Held Change Notes"</i> page in CalWIN for follow up with the next SAR 7 or recertification. At that time, compare information that is known to the county with what the recipient reported and ensure that it is consistent.</p>

Example 2:	
Scenario	An anonymous source reports that the absent parent moved back into the home mid-period. This is a CalWORKs/CalFresh case.
Outcome	<p>CalWORKs and CalFresh</p> <p>This is not a mandatory report for CalWORKs or CalFresh. Is not considered VUR for CalFresh because is reported by a third party</p> <p>If the second parent is not reported in the home on the following SAR 7 or recertification, contact the AU/household to verify the circumstances of the Data Month. The SAR 7 could also be considered incomplete.</p>

Example 3:	
Scenario	A New Hire Report (NHR) or Public Assistance Reporting Information System (PARIS) reports show that a household member has earnings that have not been reported.
Outcome	<p>NHR and the PARIS (Medi-Cal) reports are not considered VUR.</p> <p>If the amount of income showing on the report or the verification received for Medi-Cal is or appears to be over the IRT, request additional information and verification (if needed) via the CF 32 to determine when the income started, if the income is over the IRT, and if it can be reasonably anticipated to continue for the remainder of the certification period.</p> <ul style="list-style-type: none"> • If the income is not over the IRT, enter a held change note in CalWIN to be reviewed at the next SAR 7 or recertification (whichever comes first). • If the income is over the IRT and will continue to be over the IRT, discontinue the case with timely notice.

Refer to [63-284.3\(C\)](#) and [63-285.7](#) for additional information.

63-285.8
Data and Income
& Eligibility
Verification
System (IEVS)
Matches

Evaluate information from data matches to determine if the information was *required* to be reported by the household on the SAR 7, recertification, or as a mandatory mid-period report.

A. INCOME & ELIGIBILITY VERIFICATION SYSTEM (IEVS)

The following Information from IEVS or the Payment Verification System (PVS) is considered Verified Upon Receipt (VUR):

1. Social Security and Supplemental Security Income (SSI) benefit information obtained from the Social Security Administration (SSA) and
2. Unemployment Insurance Benefits (UIB) information obtained from the Employment Development Department (EDD).

Take action, when applicable, to discontinue, increase, deny, or reduce benefits based on the information reported by IEVS/PVS. If the information obtained from IEVS/PVS about a household is questionable, or if there is reason to doubt the applicability of IEVS information, the information will not be considered VUR. Refer to [63-118.4 and 5](#).

Information obtained from the IEVS could be used to increase, decrease or discontinue benefits mid-period only if the income could be reasonably anticipated without contacting the household. Otherwise, the information is not VUR. Hold the results of the IEVS

match until the SAR 7 or recertification (whichever comes first) **unless** the total household's income including IEVS may be over the IRT. If the income could be over the IRT, request verification in writing allowing the household 10 days to respond. Refer to [63-283.4.A](#) and [63-283.5](#).

NOTE: When reconciling IEVS matches with reported income from the SAR Data Month or recertification, take prospective budgeting rules into consideration. All "reasonably anticipated" rules apply, even when retroactively considering the case for unreported information. Refer to [63-282](#).

Refer to [63-118](#) for processing timeframes.

B. OTHER IEVS DATA MATCHES

Information from the following IEVS matches are not considered VUR:

1. Integrated Fraud Detection/Earnings Clearance System (IFD), Franchise Tax Board (FTB) Asset Match/Internal Revenue Service,
2. Beneficiary Earnings Exchange Record (BEER),
3. Jail Reporting System (JRS)
4. Fleeing Felon Match (FFM)
5. Nationwide Prisoner Match (NPM)
6. Deceased Persons Match (DPM)
7. New Hire Registry (NHR) Match

Do not take adverse action based solely on data taken from these matches:

- For additional NHR information, refer to [63-118.9](#).
- For generic instructions and procedures regarding the processing of the NHR Match report, refer to the [NHR Report Processing Eligibility Desk Guide \(EDG\)](#).
- For the other matches, contact the household to confirm or verify the information on the report. Refer to [63-284.3.D](#).

For all matches, write in Case Comments when the data does not affect eligibility or allotment amount based on SAR prospective budgeting rules. Refer to [63-118](#).

Refer to:

- [63-708](#), Data Matches
 - [63-287](#), Overissuances and Underissuances
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